

FILED

AO 91 (Rev. 01/09) Criminal Complaint

OCT 29 2015

SEALED

## UNITED STATES DISTRICT COURT

for the  
Western District of TexasCLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY R212 DEPUTY

United States of America )

v. )

Case No. SA: 15-MJ-909 )

JOHN MICHAEL RYMERS )

Defendant )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of February 2015 in the county of Bexar in the Western District of Texas, the defendant violated 18 U. S. C. § 2252A(a)(2), an offense described as follows:

Receipt of Child Pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

Larry Baker, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: October 29, 2015

Judge's signature

City and state: San Antonio, Texas

Pamela Mathy US Magistrate Judge

Printed name and title

Penalties: 20 years imprisonment; \$250,000 fine; lifetime supervised release; \$100 special assessment, and restitution.

SEALED

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**


I, Larry Baker, the Affiant herein, first being duly sworn, do state as follows:

1. Your Affiant is employed as a Special Agent with the Federal Bureau of Investigation (FBI) in San Antonio, Texas. Your Affiant has been a Special Agent with the FBI since January, 1999. Your Affiant's experiences as a Special Agent include, but are not limited to, conducting investigations, executing arrest warrants, executing search warrants, collection of evidence, interviewing of witnesses, use of force, firearms and other law enforcement related topics. Your Affiant is currently assigned to the FBI Cyber Crimes Unit, where he conducts investigations relating to violations of the laws of the United States as they relate to computer-related crimes.
2. The factual information supplied in this affidavit is based upon your Affiant's own investigation as well as information provided by other law enforcement officers. Since this affidavit is submitted for the purpose of securing an arrest warrant, it does not include every fact known to me concerning this investigation. I have set forth facts that I believe establish probable cause to believe that JOHN MICHAEL RYMERS (RYMERS), date of birth February 26, 1987, has violated the provisions of Title 18, United States Code, Section 2252A(a)(2).
3. The San Antonio Division of the FBI received information that an individual using an IP address in San Antonio, Texas, was logging into a particular website on multiple occasions between February and March of 2015, to access postings and files depicting the sexual abuse and exploitation of children. One of the postings accessed by this individual featured a link to a series of images that depicted two prepubescent females engaged in vaginal intercourse and oral sex with two adult males.
4. On October 23, 2015, FBI agents executed a search warrant at the San Antonio, Texas, home of RYMERS and seized digital devices. Affiant interviewed RYMERS during the execution of a federal search warrant at RYMERS's residence. RYMER advised Affiant that he has utilized the Internet for the past 6 years in order to view and download child pornography images and videos. RYMERS is presently utilizing a computer system, and the associated Internet service, located at his residence in San Antonio, Texas, to view images and videos of


child pornography and to download images and videos of child pornography. RYMERS stores these child pornography images and videos on the hard drive housed in this computer system as well as a portable hard drive. RYMERS masturbates to these child pornography images and videos.

5. A forensic preview of RYMERS' portable Western Digital My Book hard drive was conducted and revealed numerous files depicting children engaged in sexually explicit conduct. One image dated February 18, 2015 depicts a collage of photos from a video entitled "Vick-CumChoke\_01\_2004.avi. The collage contains sixteen images of a nude minor female child performing oral copulation on the penis of an adult male. Each image depicted in the collage contains a time code located in the bottom right corner of the image. The time codes range from 00:00:07 through 00:01:46.

6. Based on the aforementioned facts, your affiant respectfully submits that there is probable cause to believe that JOHN MICHAEL RYMERS, knowingly received any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

  
Larry Baker, Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 29 day of October, 2015.

  
PAMELA MATHY  
U.S. MAGISTRATE JUDGE